

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DOMINICA MANAGEMENT, INC.,

Civil Action No.:

Plaintiff,

-against-

AMERICAN UNIVERSITY OF ANTIGUA
COLLEGE OF MEDICINE, NEAL S.
SIMON and SOL WELTMAN,

**PLAINTIFF'S FIRST
REQUEST FOR PRODUCTION
OF DOCUMENTS**

Defendants.

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Plaintiff, by and through its attorneys, CULLEN AND
DYKMAN BLEAKLEY PLATT LLP, serves the following request for
production of documents upon Defendant American University of
Antigua College of Medicine to be responded to, pursuant to
Fed R Civ P 34, within 30 days after the date of service.

INSTRUCTIONS FOR RESPONDING

1. Plaintiff, Dominica Management, Inc. ("DMI") incorporates
Local Civil Rule §26.3 of the Federal Rules of Civil Procedure
as the instructions and definitions applicable herein.

REQUESTS

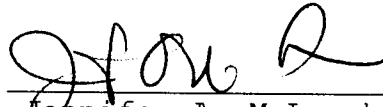
1. Documents regarding the computer programs used or
currently in use by AUA to manage student affairs since April,
2004.

2. The source code of the computer programs referred to in Request No. 1.
3. The internal alpha and beta builds of said source code.
4. The compiled versions of said source code.
5. Access to client server set-ups that facilitate the running of the aforementioned programs.

Dated: Garden City, New York
September 28, 2004

CULLEN AND DKYMAN BLEAKLEY PLATT LLP

By:



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